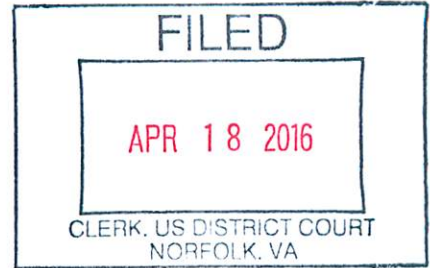


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News DIVISION

(Write the District and Division, if any, of the  
court in which the complaint is filed.)



Lucille Yvette ARRINGTON  
A.K.A. Lucy Arrington

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

**-against-**

Alabama Power Company and its  
parent company Southern Company

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

**Complaint for a Civil Case**

Case No. 4:16 cv 25  
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No  
(check one)

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Defendants VIOLATED the Plaintiffs Civil Rights under Title VII  
of the Civil Rights Act of 1964 and the Americans with  
Disabilities Act of 1990

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Lucille Arrington, is a citizen of  
the State of (name) VIRGINIA.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name)  
\_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Lucille Arrington</u>
Street Address	<u>2502 Carriage House Way</u>
City and County	<u>Williamsburg, James City County</u>
State and Zip Code	<u>Virginia 23188</u>
Telephone Number	<u>205-614-2747</u>
E-mail Address	<u>lucille.arrington@gmail.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Alabama Power Company</u>
Job or Title (if known)	<u></u>
Street Address	<u>600 N 18th Street</u>
City and County	<u>Birmingham, Jefferson</u>
State and Zip Code	<u>Alabama 35203</u>
Telephone Number	<u>205-257-1000</u>
E-mail Address (if known)	<u></u>

**Defendant No. 2**

Name	<u>Southern Company</u>
Job or Title (if known)	<u></u>
Street Address	<u>30 Ivan Allen Jr Blvd.</u>
City and County	<u>Atlanta, Fulton County</u>

State and Zip Code GEORGIA 30308  
 Telephone Number 404-506-5000  
 E-mail Address \_\_\_\_\_  
 (if known)

**Defendant No. 3**

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known)

**Defendant No. 4**

Name \_\_\_\_\_  
 Job or Title \_\_\_\_\_  
 (if known)  
 Street Address \_\_\_\_\_  
 City and County \_\_\_\_\_  
 State and Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 E-mail Address \_\_\_\_\_  
 (if known)

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

b. If the defendant is a corporation

The defendant, (name) ALABAMA Power Company is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) Alabama. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Daily exposure to Toxic Mold resulting in a new Asthma diagnosis, new diagnosis of Acid reflux "GERD", migraines, hair loss and emotional distress - see Attachment

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See ATTACHMENTS

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: April 18<sup>th</sup>, 2016

Signature of Plaintiff

Printed Name of Plaintiff

Lucille Y. BRINGTON

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

**Signature of Attorney**

\_\_\_\_\_

**Printed Name of Attorney**

\_\_\_\_\_

**Bar Number**

\_\_\_\_\_

**Name of Law Firm**

\_\_\_\_\_

**Address**

\_\_\_\_\_

**Telephone Number**

\_\_\_\_\_

**E-mail Address**

\_\_\_\_\_